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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

REBECCA BALLINGER,

Plaintiff,

vs.

PRIME HEALTHCARE SERVICES – RENO,  
LLC, a Foreign Limited Liability Company,  
dba St. Mary’s Regional Medical Center.

Defendant.

CASE NO.: 3:22-cv-00084-MMD-CLB

**STIPULATION AND  
PROPOSED ORDER FOR  
ENLARGEMENT OF TIME**

**For Plaintiff to File Response  
To Defendant’s Partial Motion to Dismiss  
Plaintiff’s Complaint**

**(ECF 005)**

**(First Request)**

The parties to this action, by and through their undersigned counsel of record hereby stipulate that Plaintiff may have a two (2)-week extension of time, **through and including Tuesday, May 24, 2022**, to file her response to *Defendant’s Partial Motion to Dismiss Plaintiff’s Complaint* (ECF 005). This is the first request for such an extension. The original deadline to file this opposition is Tuesday, May 10, 2022. The reason Plaintiff needs additional time to file this brief is because her counsel has a very congested calendar and was out of the office for much of last week, and he will need additional time to prepare a responsive brief.

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1 This Stipulation is not offered for any dilatory or improper purpose.

2  
3 Dated this 9<sup>th</sup> day of May 2022.

Dated this 9<sup>th</sup> day of May 2022.

4 LITTLER MENDELSON

THE GEDDES LAW FIRM, P.C.

5  
6 *Electronic Signature Authorized*

7  
8 By: /s/

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15 **ORDER**

16 Dated: May 9, 2022

IT IS SO ORDERED



UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**


I hereby certify that I am an employee of the Geddes Law Firm, P.C., and that on **May 9, 2022**, I caused to be served a copy of the foregoing *Stipulation and Proposed Order for Enlargement of Time for Plaintiff to File Response to Defendant's Partial Motion to Dismiss Plaintiff's Complaint (First Request)*, by electronic filing with the Court's Pacer e-filing system, addressed to:

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Prime Healthcare Services – Reno, LLC*

Dated this 9<sup>th</sup> day of May 2022.

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